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Attorneys for Defendant
 TEXTRON INC.

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

SHANNON LEGHART, an individual,

Plaintiff,

v.

TEXTRON INC., a Delaware corporation;
 E-Z-GO GOLF CARS, a Textron
 company; and DOES 1 through 50,
 inclusive,

Defendants.

Case No. 3:14-CV-01226-BAS-JMA

**DEFENDANT TEXTRON INC.'S:
 NOTICE OF MOTION AND
 MOTION FOR PARTIAL
 SUMMARY JUDGMENT
 ON PUNITIVE DAMAGES**

Hearing Date:

Time 10:30 a.m.

Courtroom: 4B

Judge Cynthia Ann Bashant

Trial Date: July 5, 2016

**NO ORAL ARGUMENT UNLESS
 REQUESTED BY THE COURT**

**TO: PLAINTIFF SHANNON LEGHART AND HER ATTORNEYS OF
RECORD:**

PLEASE TAKE NOTICE that at 10:30 a.m. on a date to be determined by the Court, or as soon thereafter as the matter may be heard before the Honorable Cynthia Ann Bashant in Courtroom 4B of the United States District Court, Southern District of California, located at 221 West Broadway, San Diego, California, defendant Textron Inc. ("Textron") will and hereby does move the Court for an order granting partial judgment in its favor and against Plaintiff Shannon Leghart on Plaintiff's claim for punitive damages set forth in the Complaint For Compensatory and Punitive Damages filed on April 10, 2014.

The Motion, made pursuant to Rule 56 of the Federal Rules of Civil Procedure and case law interpreting that rule, will be made on the grounds that Plaintiff has no clear and convincing evidence that Textron acted with the malice, oppression, or fraud required to award of punitive damages under California Civil Code section 3294 and case law interpreting that section.

The Motion will be based on this Notice; the Joint Memorandum of Points and Authorities and Joint Declaration of Jeffrey A. Healy, including exhibits thereto, filed and served herewith; the records and files herein; and on such additional evidence and argument as may be presented at the time of hearing.

DATED: January 8, 2016

TUCKER ELLIS LLP



By: _____

Peggy S. Doyle
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TEXTRON INC.